

# Sage Legal LLC

18211 Jamaica Avenue • Jamaica, NY 11423-2327 • (718) 412-2421 • emanuel@sagelegal.nyc

March 8, 2025

## VIA ECF

United States District Court  
Eastern District of New York  
Attn: Hon. Nusrat J. Choudhury, U.S.D.J.  
100 Federal Plaza  
Courtroom 1040  
Central Islip, NY 11722

**Re: Rivas v. Ariel Auto Collision Corp., et ano.**  
**Case No.: 2:23-cv-5371 (NJC) (SIL)**

Dear Judge Choudhury:

This firm was recently retained to represent the Defendants in the above-referenced case, who respectfully submit this letter motion in accordance with ¶¶ 1.7 and 5.1 of this Court's Individual Rules (hereinafter the "Individual Rules") to respectfully request a fourteen (14) day extension of time to submit the parties' anticipated joint letter motion for settlement approval.

Consistent with the Individual Rules, Defendants respectfully submit that: (i) the reason for the request is to permit the parties to complete negotiations related to the settlement agreement and have the parties execute same; (ii) the original date of the deadline to submit the joint letter motion was yesterday, March 7, 2025; (iii) there has been one (1) previous requests for an extension of time of this deadline; (iv) the joint request was granted by this Court; (v) the adversary consents to and joins in the request for an extension; and (vi) the requested extended date to submit the joint letter motion is March 21, 2025. Defendants respectfully submit that based on the foregoing, there exists sufficient good cause and excusable neglect for this Court to exercise its discretion in favor of granting the requested extension of time. See Fed. R. Civ. P. 6(b)(1)(B).

The parties thank this honorable Court for its time and attention to this case.

Dated: Jamaica, New York  
March 8, 2025

Respectfully submitted,  
**SAGE LEGAL LLC**  
By: /s/ Emanuel Kataev, Esq.  
Emanuel Kataev, Esq.  
18211 Jamaica Avenue  
Jamaica, NY 11423-2327  
(718) 412-2421 (office)  
(917) 807-7819 (cellular)  
(718) 489-4155 (facsimile)  
emanuel@sagelegal.nyc

*Attorneys for Defendants*  
*Ariel Auto Collision Corp.*  
*and Rodshel Khaimov*

**VIA ECF**

Colin Mulholland, Esq.  
3636 33rd Street, Suite 308  
Astoria, NY 11106  
cmulhollandesq@gmail.com

*Attorneys for Plaintiff*  
*Juan Martinez Rivas*